

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GARNELL BAILEY,	:	
	:	
	:	
Plaintiff,	:	No. 02-CV-4683
	:	
V.	:	The Honorable James Knoll Gardner
	:	
LUCENT TECHNOLOGIES INC.	:	
and AGERE SYSTEMS INC.,	:	
	:	
Defendants.	:	

AFFIDAVIT OF GLENNIS CLARK

I, Glennis Clark, Esquire, conducting business at the Law Firm of Glennis L. Clark, 1908 W. Allen Street, Allentown, PA 18104, on behalf of my client, Garnell Bailey, do hereby swear, affirm and attest as follows, based upon my personal knowledge of the matters contained herein:

1. The Defendants have filed a Bill of Costs for the defense of the within matter in the amount of \$25,181.00.
2. Plaintiff is financially unable to pay the fee to have the transcript of the trial transcribed.

3. Plaintiff has exhausted all means to obtain the funds for the transcript, including cash value of her life insurance, equity in her home, personal savings accounts and access to funds through family members and friends.

4. Plaintiff's monthly expenses exceed the net monthly income of both Plaintiff and her husband.

5. Plaintiff withdrew proceeds from her 401(K) account.

6. Plaintiff lost pension benefits as a result of her termination from Agere.

7. Plaintiff has been unsuccessful in her attempts to raise the necessary funds to pay for the transcription of trial transcript.

Date: December 9, 2004

GLENNIS L. CLARK